

### REMARKS

In the Office Action, the Examiner rejected claims 1 - 3, 5 - 11, 25 - 27, and 29 - 35 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Number 6,633,899 (“Coward”) in view of U.S. Patent Number 6,208,720 (“Curtis”). The Examiner also rejected claims 4, 15, 16, 20 - 24, 28, 39, 40, and 44 - 48 under 35 U.S.C. § 103(a) as being unpatentable over Coward in view of Curtis and further in view of U.S. Patent Application Publication Number 2002/0010776 (“Lerner”). The Applicant has amended claims 1 and 25 and submits the following arguments in favor patentability.

Additionally, the Examiner restricted claims 49 - 53 as being directed to an invention that is independent or distinct from the invention originally claimed and subsequently withdrew these claims from prosecution. The Applicant previously traversed the restriction. The Applicant again submits the arguments in favor of maintaining claims 49 – 53 with the present application as well as arguments in favor of patentability and respectfully requests reconsideration.

#### *Restriction of Claims 49 - 53*

The Examiner previously restricted claims 49 - 53 as being directed to an invention that is independent or distinct from the invention originally claimed. The Applicant traversed this restriction and maintains that claims 49 - 53 recite an invention that differs from the original claims only in terms of scope. The Examiner withdrew claims 49 – 53, but never addressed the Applicant’s traversal as required. *See* 37 C.F.R. § 1.143 stating ‘The requirement for restriction will be reconsidered on such a request’; *See also*, § 1.111(b), and M.P.E.P. § 818.03.

Again, in claim 49, the Applicant recites a service control message broker that operates in service control layer as similarly recited in original claim 1. This message broker is in communication with a plurality of service providers and in communication with a plurality of transport association controllers (TACs). A system entity, as originally recited in claim 1, may include a service provider. Original claim 2 recited that system entities could also include TACs. Claim 49 also recites an integrated service

controller in the service control layer that communicates with the message broker. The ISC maintains an event registration list and a message registration list relating to a plurality of services provided by a plurality of service providers. The Applicant recited an ISC in originally presented claim 2. The ISC of claim 49 recites features similarly described in other originally presented claims that depend from claim 1.

The Examiner stated, in the previous Non Final Office Action, that the message broker of claim 49 differs from the message broker originally presented in claim 1. The message broker of originally presented claim 1 differs in the fact that it recites additional limitations. However, the message broker of originally presented claim 1 is in communication with a plurality of system entities, such as service providers and TACs, because it provides “message” processing between these entities. The Applicant, therefore, maintains that claim 49 differs only in scope from the Applicant’s originally presented claims. For at least these reasons, the Applicant again respectfully requests reconsideration of claims 49 – 53 in the form of a new Office Action that at least addresses the Applicant’s traversal.

#### *Rejections of Claims 1 – 11, 15, 16, and 20 - 24*

In claim 1, the Applicant recites a system for providing exchange of messages and associated data across a plurality of communication network system entities for a plurality of communications networks. The system includes at least one distributed message broker that operates in a services control layer and connectable to the plurality of communication network system entities of a plurality of communications networks. The at least one message broker provides message processing between a plurality of system entities and the message processing includes relaying and/or screening based on prioritization rules of at least one of customer classification, associated service classification, and system entity classification applied to a message classification of one or more messages communicated over the plurality of communications networks between the plurality of system entities. The system also includes an integrated service controller (ISC) connectable with the message broker. The ISC classifies, registers, integrates, operates, and prioritizes a new telephony service. The Applicant has amended claim 1 to recite that the ISC includes processing modules that provide dynamic integration of

multiple services, organization of customer preference information with regards to communication services, monitoring of transport, and intelligent prioritization and distribution of messages. The amendment is supported on page 15, lines 10-13 of the Applicant's specification.

Coward does not teach an ISC that provides for the dynamic integration of multiple services, organization of the customer preference information with regards to the communication services (i.e., telephony services), the monitoring of the transport, and the intelligent prioritization and distribution of messages. Curtis adds nothing to supplement Coward in this regard. Nor does Coward teach or reasonably suggest any type of telephony service.

Claims 2 - 11, 15, 16, and 20 – 24 depend from independent claim 1 and inherit all of the novel and nonobvious features of the independent claim. For at least these reasons, claims 2 - 11, 15, 16, and 20 – 24 are also novel and nonobvious and the Applicant respectfully requests reconsideration and allowance of these claims.

*Rejections of Claims 25 - 35, 39, 40, and 44 - 48*

In claim 25, the Applicant recites a method for providing exchange of messages and associated data across a plurality of communication network system entities for a plurality of communications networks. The method includes configuring at least one message broker in a service control layer to establish connections with a plurality of communication network system entities of at least one communications networks. The method also includes receiving and processing one or more messages from the system entities, wherein the processing includes at least one of relaying and screening based on prioritization rules of at least one of customer classification, associated service classification, and system entity classification applied to a message classification of one or more messages communicated over the at least one communications network between the plurality of system entities. Additionally, the method includes configuring an integrated service controller (ISC) to classify, register, integrate, operate, and prioritize a new telephony service. The Applicant has amended claim 25 to recite that the method also includes configuring processing modules of the ISC to provide dynamic integration of multiple services, organization of customer preference information with regards to

communication services, monitoring of transport, and intelligent prioritization and distribution of messages.

Coward does not teach configuring an ISC to provide for the dynamic integration of multiple services, organization of the customer preference information with regards to the communication services (i.e., telephony services), the monitoring of the transport, and the intelligent prioritization and distribution of messages. Curtis adds nothing to supplement Coward in this regard. Nor does Coward teach or reasonably suggest any type of telephony service.

Claims 26 - 35, 39, 40, and 44 - 48 depend from independent claim 25 and inherit all of the novel and nonobvious features of the independent claim. For at least these reasons, claims 26 - 35, 39, 40, and 44 - 48 are also novel and nonobvious and the Applicant respectfully requests reconsideration and allowance of these claims.

#### CONCLUSION

Based upon the foregoing, the Applicant believes that all pending claims are in condition for allowance and respectfully requests. Should the Examiner not be persuaded by the above arguments, the Applicant respectfully requests a quick response so that the present application may be better framed for appeal. In the event that a telephone conversation would further prosecution and/or expedite allowance, the Examiner is invited to contact the undersigned.

Respectfully submitted,

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